

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

City of Chicago;
City and County of Denver; and
Pima County;

Plaintiffs,

vs.

United States Department of Homeland
Security;
Kristi Noem, in her official capacity as
Secretary of the Department of Homeland
Security;
United States Federal Emergency Management
Agency;
David Robinson, in his official capacity as
Acting Administrator of the Federal Emergency
Management Agency;

Defendants.

Case No. 25-cv-5463

Hon. Matthew F. Kennelly

JOINT STATUS REPORT

Pursuant to the Court's minute order dated September 23, 2025, the parties submit this joint status report.

1. Plaintiffs filed a motion for preliminary injunction in June 2025, and the Court held argument on that motion on September 23, 2025.

2. At argument, the Court proposed advancement of the trial on the merits and consolidation with the preliminary injunction hearing pursuant to Fed. R. Civ. P. 65(a)(2) and requested the parties file this status report setting forth their positions. The Court also asked the parties to consider what, if any, discovery would be necessary before resolution on the merits.

3. Plaintiffs do not believe additional discovery is necessary to resolve this case on the merits and have no objection to consolidation.

4. Defendants also do not believe additional discovery is necessary to resolve this case on the merits but do not agree to consolidation under Rule 65(a)(2).

Dated: September 30, 2025

Respectfully submitted,

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